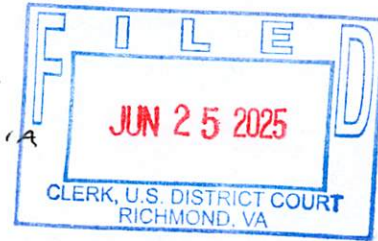


IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division



KEVIN JOHNSON,

Plaintiff,

v. Case No. 3:24-cv-00080-HEH

VIRGINIA DEPARTMENT OF CORRECTIONS, et al.,

Defendants.

REQUEST FOR PRODUCTION OF DOCUMENTS AND
THINGS

Plaintiff pro se pursuant to F.R. Civ. P. 34 hereby requests that the defendants and defense counsel produce the following documents and things to him for inspection, possession, use and retention within 30 days from the date of service hereof. This request is sought in pursuit of plaintiff's seeking and pursuing summary and/or plenary proceedings to enforce and set aside the December 4, 2024 settlement agreement herein consistent with Hensley v. Alcon, 277 F.3d 535 (4th Cir. 2002); Milner v. Norfolk, 643 F.2d 1005 (4th Cir. 1981); Ozyagcilar v. Davis, 701 F.2d 306 (4th Cir. 1983), etc. This request for production shall be continuing in nature until the closing of these proceedings and this case, and you are instructed to serve supplemental responses to the extent required by the F.R. Civ. P.:

i. Any and all items of plaintiff's personal property which he had in his personal possession and which was stored in the personal property department at Virginia's Keen Mountain Correctional Center prior to and up until his May 1, 2025 transfer to the South Carolina Department of Corrections (SCDC), including all documents, publications and periodicals, tangible items, and any other articles of personal property.

Exhibit A

2. Any and all correspondences and agreements between any and all agents of the Virginia Department of Corrections (VDOC) and the SCOC concerning plaintiff and his transfer to the SCOC under Virginia's Interstate Corrections Compact and any other agreements.

3. Any and all correspondences and communications between any agent or attorney with the Virginia Attorney General's office and any agent of the VDOC and SCOC concerning plaintiff and his transfer to, treatment within and legal status in the SCOC.

Sincerely,



Plaintiff pro se

Reply to: Kevin Johnson, No. 397279
Perry Correctional Institution
430 Oaklawn Rd
Pelzer, SC 29669

CERTIFICATE

I hereby certify under penalty of perjury that I did have this document mailed by placing it into care of custodial officials for mailing postage prepaid on this 14th day of May 2025 to D. ~~Patricia~~ Patricia Wallace, Assistant Attorney General, 202 N. 5th St., Richmond, VA. 23219.



Plaintiff pro se